



**CTIA**

*Building The Wireless Future™*  
Cellular Telecommunications & Internet Association

December 20, 2002

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
12th Street Lobby, TW-A325  
Washington, DC 20554

**Re: Ex Parte Presentation**  
**IB Docket No. 01-185; ET Docket No. 95-18; ET Docket No. 00-258**

Dear Ms. Dortch:

On December 20, 2002, Diane Cornell, Vice President for Regulatory Policy, the Cellular Telecommunications & Internet Association, Don Brittingham, Director for Spectrum Policy, Verizon Wireless, Luisa Lancetti, Vice President, Regulatory Affairs, Sprint PCS, David Wye, Director for Spectrum Policy, AT&T Wireless Services, Inc., Cecily Cohen, Director for Government & Industry Affairs, Nokia, Inc., and Steve Sharkey, Director for Spectrum and Standards Strategy, Motorola, met with Bryan Tramont, Senior Legal Advisor to Chairman Powell, Bruce Franca, Deputy Chief of the Office of Engineering and Technology, and Scott Delacourt, regarding the above captioned proceedings.

During the meeting, the wireless representatives discussed adjacent channel interference issues related to various band plan and service options that could be considered in resolving the outstanding issues raised in these proceedings. In particular, we expressed concern regarding the potential for handset-to-handset interference as a result of reducing the duplex gap in the PCS band, and noted the limited ability of filter technologies to overcome this interference. The impact that any change in the duplex gap would have on current PCS operations must be thoroughly understood before any action is taken.

The same interference mechanism applies for handset operations above 1990 MHz. To the extent that the Commission might consider allowing mobile operations above 1990 MHz that are similar to PCS, including as a result of allowing ancillary terrestrial use of spectrum allocated to the mobile satellite service, the potential exists for



mobile-to-mobile interference and would require a guardband between mobile transmit and mobile receive bands. The Commission must fully understand the impact of such interference and take steps to protect PCS operations prior to taking action.

In addition to handset-to-handset interference, we discussed the potential for MDS operations to interfere with adjacent operations. The extent of such interference and the amount of guardband required to protect against interference depends greatly on the technical and operational characteristics of the MDS operations. However, it is extremely important that there be an adequate guardband between MDS and adjacent operations to ensure that no harmful interference occurs.

To the extent that there are a number of issues and possibilities under consideration, we urged that the Commission work closely with industry to fully understand the impact of various proposals to arrive at a decision that provides the greatest benefit to all concerned parties.

Pursuant to Section 1.1206(b)(2) of the Commission's rules, this letter is being filed electronically. If you have any questions concerning this submission, please contact the undersigned.

Sincerely,

*Diane Cornell*

Diane Cornell

Cc: Bryan Tramont  
Scott Delacourt  
Bruce Franca

